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July 3rd, 2020

Judge Edgardo Ramos United States District Court Southern District of New York - Courtroom 619 40 Foley Square New York, New York 10007

Re: Antolin vs. Sassouni et al Case No.: 1:19-cv-08496

Dear Judge Ramos,

I represent Plaintiff Dino Antolini in this matter. To date, Plaintiff has submitted five letters to the Court seeking discovery from defendants, to wit: December 12, 2019, January 11, 2020, February 20, 2020, March 10, 2020, May 23, 2020. Moreover, five Court Orders on outstanding discovery owed by defendants have been issued as well, dated February 7, 2020, March 10, 2020, April 10, 2020, and May 28, 2020.

Incredibly, it is now been ten (10) months since this lawsuit was filed and we are in the middle of nowhere, thanks to the behavior of defendants.

This Court's last order of May 24, 2020 directed defendants to produce documents responsive to the requests described in Plaintiff's letter of May 4, 2020, [DE 33] by July 1, 2020.

On July 1, 2020 defendants did not do so, and instead opted to send us just a trace amount of what is due and owing, empowering them to continue stonewalling this lawsuit. Again, we will be quite on point with a detailed compiling of all the outstanding discovery in our Rule 37 Motion, conditioned of course on the Court granted consent.

Respectfully,

The request to file a Rule 37 motion is GRANTED. The plaintiff will file his motion by July 20, 2020. The defendants will file their opposition by August 3, 2020.

SO ORDERED.

Edgardo Ramos, U.S.D.J

Dated: Jul. 06, 2020

New York, New York

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Very trially your

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